

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NORTH CAROLINA
RALEIGH DIVISION

In re:

HARRELL EVERETT JONES, JR.
PAULA VITCHKOSKI JONES
Debtors.

Case No. 08-05806-5-DMW

Chapter 13

OPPOSITION TO MOTION TO DISMISS

Harrell Everett Jones, Jr. and Paula Vitchkoski Jones, the Debtors in the above-captioned case (the “Debtors”), hereby oppose the motion to dismiss filed by the Chapter 13 Trustee on or about September 26, 2019. In support of this opposition the Debtors respectfully represent:

1. The Trustee’s motion seeks the dismissal of the Debtors' case for:
delinquency.
2. The Debtors would like to propose to resume regular payments in October
and cure over six months starting November 1, 2019
3. The Debtors request that this matter be set for hearing.

WHEREFORE, the Debtors respectfully request that the motion to dismiss be denied; that a hearing be scheduled prior to dismissal; and for such other and further relief as the Court deems just and proper.

Respectfully submitted this the 17th day of October, 2019.

s/William G. Berggren
William G. Berggren
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CERTIFICATE OF SERVICE

I, William G. Berggren, of BERGGREN LAW OFFICES, PLLC, hereby certify:

That I am, and at all times hereinafter mentioned was, more than eighteen (18) years of age;

That on the 17th day of October 2019, I served the “Opposition To Motion To Dismiss” by causing a true and correct copy thereto to be served electronically on the parties listed below:

John F. Logan

I certify under penalty of perjury that the foregoing is true and correct.

This the 17th Day of October 2019.

BERGGREN LAW OFFICES, PLLC

s/William G. Berggren

William G. Berggren

State Bar No. 18675

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